

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

| | | |
|-----------------------|---|-----------------------|
| IN RE: |) | |
| |) | |
| DIANE ELIZABETH ELDER |) | Case No. 20-32216-KLP |
| |) | Chapter 7 |
| Debtor |) | |

**MOTION TO EXPEDITE HEARING ON MOTION
TO EXTEND STAY AND TO SHORTEN NOTICE PERIOD**

COMES NOW the Debtor, by counsel, and moves this Court to Expedite the Hearing on the Motion to Extend the Automatic Stay and to Shorten Notice Period, and in support thereof states as follows:

1. The Debtor filed a petition for relief under Chapter 7 of the Bankruptcy Code on May 6, 2020.
2. On or about May 26, 2020 the Debtor filed a Motion to Convert this case to Chapter 13.
3. Within the year prior to filing the instant case, Debtor has been a debtor in one (1) pending Chapter 13 bankruptcy case (the “previous case”).
4. Pursuant to 11 U.S.C. § 362, the hearing on the Debtor’s Motion to Extend the Automatic Stay (“Motion”) must be heard within thirty (30) days of the filing of the petition.
5. As the Debtor has now filed a Motion to Convert this case to a Chapter 13, an extension of the automatic stay is necessary.

WHEREFORE, the Debtor respectfully requests that the Court expedite the hearing on the Motion to Extend the Automatic Stay, Shorten the Notice Period required for said Motion, and grant it such other and further relief as is just and proper.

Dated: May 29, 2020

DIANE ELIZABETH ELDER

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
jkane@kaneandpapa.com
Counsel for Debtor

CERTIFICATION

I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
2. I have not created the emergency through any lack of due diligence.
3. I have made a *bona fide* effort to resolve the matter without hearing.

By: /s/ James E. Kane
James E. Kane

CERTIFICATE OF SERVICE

I certify that on May 29, 2020, I have transmitted a true copy of the foregoing document electronically through the Court's CM/ECF system or by mail to the Debtor, Chapter 13 trustee, the United States trustee if other than by the electronic means provided for at Local Bankruptcy Rule 2002-1, all attorneys appearing in the previous case as listed below, and to all creditors and parties in interest of the mailing matrix attached hereto.

/s/ James E. Kane
Counsel for Debtor

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| Debtor |) | |

NOTICE OF MOTION AND HEARING

The above Debtor has filed Motion for an Expedited Hearing on the Motion to Extend the Automatic Stay and to Shorten the Notice Period in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing on **June 3, 2019 at 10:00 a.m. in Honorable Judge Keith L. Phillips' Courtroom, U.S. Bankruptcy Court, 701 E. Broad Street, Room 5100, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: May 29, 2020

DIANE ELIZABETH ELDER

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
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(804) 225-9598 (fax)
jkane@kaneandpapa.com
Counsel for Debtor

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/s/ James E. Kane
Counsel for Debtor

America Infosource
Verizon
PO Box 248838
Oklahoma City, OK 73124

Anesthesia Solutions of VA
PO Box 73983
Dept. 1011
Atlanta, GA 30374

Atlas Acquisitions LLC
2601 Cattleman Rd.
Sarasota, FL 34232

Autotrakk Llc
Attn: Bankruptcy Department
1500 Sycamore Rd., Ste. 200
Montoursville, PA 17754

Blue & Grey Emerg Phys
PO Box 37877
Philadelphia, PA 19101

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130

CCI/Contract Callers Inc
Attn: Bankruptcy Dept
501 Greene St Ste 302
Augusta, GA 30901

Check Express Advance
10679 Courthouse Road
Fredericksburg, VA 22407

Comenity Bank/roamans
Po Box 182789
Columbus, OH 43218

Convergent Outsourcing, Inc.
Attn: Bankruptcy
Po Box 9004
Renton, WA 98057

Credit Control Corp
Po Box 120568
Newport News, VA 23612

Cybrcollect
Attn: Bankruptcy
3 Easton Oval, Ste 210
Columbus, OH 43219

Darcey Geissler
919 Ware Street, SW
Vienna, VA 23180

Easy Comforts
P.O. Box 2861
Monroe, WI 53566

Fredericksburg Em Med Alliance
P.O. Box 808
Grand Rapids, MI 49518-0808

Fredericksburg Orthopaedic As
3310 Fall Hill Ave
Fredericksburg, VA 22401

Genesis Bc/celtic Bank
Attn: Bankruptcy
268 South State Street Ste 300
Salt Lake City, UT 84111

Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud, MN 56302

Jefferson Capital Systems LLC
PO Box 17210
Golden, CO 80402

LVNV Funding/Resurgent Capital
Attn: Bankruptcy
Po Box 10497
Greenville, SC 29603

Mary Washington Healthcare
2300 Fall Hill Ave.
Suite 101
Fredericksburg, VA 22401

MDG US/Capital Community Bank
49 W University Pkwy
Orem, UT 84058

Medical Imaging of Fredericks.
P.O. Box 7606
Fredericksburg, VA 22404

Midland Funding
2365 Northside Dr Ste 300
San Diego, CA 92108

MultiSpecialty Health Group
4604 Spotsylvania Pkwy
Suite 200
Fredericksburg, VA 22408

O'Sullivan Pathology, PLLC
9834 Business Way
Manassas, VA 20110

ODC Recovery Services, Inc
2300 Fall Hill Ave., Suite 314
Fredericksburg, VA 22401

Orthopaedics Specialists
PO Box 409591
Atlanta, GA 30384

Quantum 3 Group LLC
Comenity Bank
P.O. 788
Kirkland, WA 98083

Regional Acceptance Co
Attn: Bankruptcy
Po Box 1487
Wilson, NC 27894

Regional Acceptance Co
Attn: Bankruptcy
1424 E Firetower Rd
Greenville, SC 27858

Remote Neuromonitoring Phys
Dept 2105
PO Box 11407
Birmingham, AL 35246

Security Check
Attn: Bankruptcy Dept
2612 Jackson Ave W
Oxford, MS 38655

Spotsylvania Multi Specialty
4604 Spotsylvania Pkwy
Suite 200
Fredericksburg, VA 22408

Spotsylvania Regional Medical
PO Box 13620
Henrico, VA 23255

Spottsylvania Regional Medical
4600 Spotsylvania Parkway
Fredericksburg, VA 22408

Stafford Hospital Center
101 Hospital Center Blvd
Stafford, VA 22554

Surgi-Center of Central VA
1500 Dixon St #101
Fredericksburg, VA 22401

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United Consumer Financial
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United Consumer Financial Services
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Po Box 856290
Louisville, KY 40285

US Department of Education/Great Lakes
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